

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

Clifford T Shiflet ) C/A No. \_\_\_\_\_  
Plaintiff, )  
vs. )  
BASF Corporation ) *Pro Se Party's Answers to*  
\_\_\_\_\_, ) *Rule 26.01 Interrogatories*  
Defendant(s). )  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Clifford Thomas Shiflet 125 Carling Dr Anderson, SC 29625 (864)224-0387  
Seeking to collect pension earned between 1968-1980  
\_\_\_\_\_  
\_\_\_\_\_

(B) As to each claim, state whether it should be tried jury or non jury and why.

I would choose a jury because my peers would be  
likely to understand why I chose to file. The  
majority of them would be working folk like myself.  
\_\_\_\_\_  
\_\_\_\_\_

(C) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Plaintiff lives & worked in Anderson. Defendant is in  
New Jersey.  
\_\_\_\_\_  
\_\_\_\_\_

(D) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide:

- (1) a short caption and the full case number of the related action;
- (2) an explanation of how the matters are related; and
- (3) a statement of the status of the related action.

Please disclose any cases which may be related regardless of whether they are still pending.

Note: Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

No other cases.

(E) [**Pro Se Defendants** only.] If the defendant is improperly identified, give the proper identification and state whether the party(ies) submitting these responses will accept service of an amended summons and pleading reflecting the correct identification.

The defendant is BAST Corporation. The assistant general counsel is identified.

(F) [**Pro Se Defendants** only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

None

**I declare under penalty of perjury that the foregoing is true and correct.**

Signed this 4th day of December, 2018.

  
Signature of Party Responding